

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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TAJANAE ANDERSON, on behalf of herself  
and others similarly situated,

v.

LIBERTY HEALTHCARE CORPORATION  
and SARGENT’S PERSONNEL AGENCY,  
INC.

2:20-cv-03014-RAL

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CRISTINE WILLIAMS, on behalf of herself and  
others similarly situated,

Plaintiff,

v.

LIBERTY HEALTHCARE CORPORATION  
and ADVANCE SOURCING CONCEPTS LLC

2:21-cv-00691-RAL

**PLAINTIFFS’ UNOPPOSED MOTION  
FOR APPROVAL OF SETTLEMENT**

Originating Plaintiffs Tajanae Anderson and Cristine Williams and the 48 other employees who opted-in to the FLSA collective (together “Plaintiffs”) and Defendants Liberty Healthcare Corp., Sargent’s Personnel Agency, Inc., and Advance Sourcing Concepts LLC (together “Defendants”) have settled this Fair Labor Standards Act (“FLSA”) lawsuit per the accompanying Collective Action Settlement Agreement. The settlement requires Defendant to pay \$585,000 plus employer-side taxes associated with the settlement payments. Although the Third Circuit has not specifically addressed the issue, most judges agree that FLSA collective settlements must be judicially reviewed for fairness. As discussed in the accompanying memorandum of law, judicial approval is warranted.

**WHEREFORE**, Plaintiffs respectfully ask the Court to grant this motion and approve

the settlement. A proposed order is attached.

Date: September 30, 2021

Respectfully,

A handwritten signature in black ink, appearing to read "Peter Winebrake", written over a horizontal line.

Peter Winebrake  
R. Andrew Santillo  
Mark J. Gottesfeld  
Michelle L. Tolodziecki  
WINEBRAKE & SANTILLO, LLC  
715 Twining Road, Suite 211  
Dresher, PA 19025